



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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COMMISSION

2012 SEP -5 PM 4: 36

CELA

**MEMORANDUM**

**SENSITIVE**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Special Counsel to the General Counsel

Daniel A. Petalas  
Associate General Counsel for Enforcement

Kathleen Guith  
Deputy Associate General Counsel for Enforcement

**BY:** Susan L. Lebeaux *SL*  
Assistant General Counsel

Delbert K. Rigsby *DKR*  
Attorney

**SUBJECT:** MUR 6584 (Johnson & Johnson PAC) -- Pre-Probable Cause  
Conciliation Agreement

2012 SEP -5 PM 4: 23

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SECRETARIAT

Attached is a signed conciliation agreement signed by Kenneth Gross, counsel for Johnson & Johnson PAC and Donald Bohn in his official capacity as treasurer ("Committee" or "Respondent"). Attachment 1. This agreement, which we recommend the Commission accept, would settle a violation of 2 U.S.C. § 434(b).

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10 We believe that the agreement represents a fair resolution of this matter. We  
11 recommend that the Commission accept the attached signed conciliation agreement with the  
12 Committee and close the file.

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14 **RECOMMENDATIONS**  
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- 16 1. Accept the attached signed conciliation agreement with Johnson & Johnson PAC and  
17 Donald Bohn in his official capacity as treasurer.  
18 2. Approve the appropriate letter.  
19 3. Close the file.  
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